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MEMORANDUM ENDORSED

March 24, 2025

VIA ECF

The Hon. Gabriel W. Gorenstein
United States District Court for the Southern District of New York
40 Foley Square
New York, NY 10007

Re: HK Kolmar USA, LLC v. Wormser Corporation, 24-cv-9144-GWG

Dear Judge Gorenstein:

We represent HK Kolmar USA, LLC (“HK Kolmar”) in the above-referenced action. We submit this letter in accordance with Your Honor’s Individual Rules 1.E and 2.B to request that the below briefing schedule govern the submission of Motions to Dismiss in this action. The undersigned has conferred with counsel for Wormser Corporation (“Wormser”) who does not object to the proposals below.

On February 13, 2025, the Court entered an Order granting the parties’ respective requests to file motions to dismiss. *See* Dkt. 22. In that Order, the Court set a March 27, 2025 deadline for the submission of the parties’ motions. We respectfully request that the Court extend this deadline to April 30, 2025, and enter the briefing schedule set forth below. We make this request due to conflicting commitments in other matters, including international business travel, depositions, and other filing deadlines, as well as counsel’s personal travel commitments, and not for purposes of undue delay. This is HK Kolmar’s first request for an extension of time and for a briefing schedule on these motions.

We request that the following briefing schedule govern the Motion to Dismiss submissions:

- Deadline to submit Motions to Dismiss and Opening Briefs – April 30, 2025
- Deadline to submit Responsive Briefs in Opposition to Motions to Dismiss – June 6, 2025
- Deadline to submit Reply Briefs in Support of Motions to Dismiss – June 20, 2025

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Jennifer Rosa
Jennifer Rosa

The proposed briefing schedule is approved. Given the unusual length of the first two deadlines, the parties should not expect any extensions. Further, the Court notes that, on or after March 28, 2025, it intends to unseal Exhibit A to Docket # 19 on the ground that HK Kolmar USA, LLC did not timely file a motion to seal as required by paragraph 2.F of the undersigned's Individual Practices and as set forth in the letter filed as Docket # 20.

So Ordered.


GABRIEL W. CORENSTEIN
United States Magistrate Judge

March 25, 2025